

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

PARADISE CRUISE LIMITED,)	CIVIL NO. CV04-00364 ACK/BMK
)	
Plaintiff,)	DECLARATION OF ELISE OWENS
)	THORN
vs.)	
)	
MICHAEL ELSE AND COMPANY)	
LTD.; GREAT LAKES)	
REINSURANCE (UK) PLC, dba)	
TRANSMARINE; LLOYD'S OF)	
LONDON; LLOYD'S)	
UNDERWRITERS; ACORDIA)	
NORTHWEST, INC.; AON RISK)	
SERVICES, INC. OF OHIO,)	
)	
Defendants.)	
_____)	

DECLARATION OF ELISE OWENS THORN

ELISE OWENS THORN SDdeclares as follows:

1. I am an attorney with the law firm of Clay Chapman Crumpton Iwamura & Pulice, counsel of record for Plaintiff Paradise Cruise Limited in this action, and am licensed to practice law before all courts in the State of Hawaii.
2. I make this declaration based upon personal knowledge, am competent to testify as to the matters set forth herein, and submit the same in support of Paradise's Notice of Settlement with Acordia Northwest, Inc. and Petition for Determination of Good Faith Settlement ("Paradise Petition").

3. Paradise seeks the court's determination, pursuant to H.R.S. § 663-15.5(b) (Supp. 2002), amended by 2003 Haw. Sess. Laws, Act 146 §1, that its settlement with Acordia was given in good faith.

5. Because the terms of the settlement are to remain confidential, the Settlement Agreement and Release between plaintiff and Acordia (hereinafter the "Settlement") is submitted under seal as Exhibit "A" pursuant to court order.

6. The settlement reached between Paradise and Acordia was made in good faith to compromise disputed claims.

7. Notice of Plaintiff's Petition has been given to all of the parties in this case. To the best of my knowledge and belief, Plaintiff is not aware of any joint tortfeasor or co-obligor who is not already a party.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 5th day of September, 2006, at Honolulu, Hawaii.



ELISE OWENS THORN